

An overview of our supplier requirements on Sustainability

All suppliers as defined in our supplier base management process must comply with our robust Supplier Requirements. In addition, we expect our suppliers to have a code of conduct in place and policies related to ethical behavior, human rights, fair employment, health and safety, environment and conflict minerals.

Our Supplier Requirements form part of our contractual agreements with suppliers. To promote sustainable improvements throughout the supply chain, we ask our suppliers to put in place similar sustainability requirements for their own suppliers.

In this document we provide an overview of our requirements related to Sustainability (Human Resources, health safety and environmental management) that are based on international standards such as United Nations Declaration of Human Rights, International Labor Organization Core Conventions, Social accountability standard SA 8000, Occupational health and safety management standard ISO45001, Environmental management standard ISO 14001, Social Responsibility Standard ISO 26001, Responsible Business Alliance (RBA) Code of Conduct and JAC Guidelines.

To align as much as possible on existing standards, Nokia expects its suppliers to apply the standards set out in the RBA Code of Conduct requirements and by the below Nokia specific Sustainability requirements that are not covered in RBA Code of Conduct.)

1. RBA Code of Conduct requirements

Supplier shall be in compliance with the latest version of [RBA Code of Conduct Requirements](#).

2. Management Responsibility

Company Business Conduct and Policies

Supplier shall have an ethical conduct policy or code defining how Supplier understands and manages the ethical and human rights impacts of its business operations.

Supplier shall also have policies covering human resources management (covering, Recruitment and Exit, Working Hours, Compensation & Benefits, Discrimination, Equal Opportunity, Harassment and Abuse, Child Labor, Forced Labor, Freedom of Association and Disciplinary Practices), health and safety, environment and responsible sourcing of minerals, when applicable.

Management shall ensure that ethical code of conduct, policies and the associated processes are communicated and understood by personnel. Training records shall be kept.

Organization and Responsibilities, Environment and Ethics

The supplier shall define roles and responsibilities, including management representative responsible for ensuring that ethics, labor, environmental and health and safety management system requirements and product/service compliance requirements are established, implement and maintained. Supplier shall provide human, technical and financial resources essential to the implementation and control of the operation's management systems, including specialized skills, when needed.

3. Human Resources Management

Working Time and Leaves

In addition to RBA code requirement A3 on working hours, overtime work if any shall be voluntary and shall not be required on a regular basis. Employees shall be entitled to minimum 14 days of paid annual leave (in addition to festival holidays) per year unless local law sets higher requirement.

Compensation and Benefits

Supplier shall respect the right of personnel to a **living wage** and ensure that wages for a normal work week, not including overtime, shall always meet at least legal or industry minimum standards, or collective bargaining agreements whichever is higher. Supplier shall provide social, medical and life insurance to its employees. Supplier shall not withhold any part of any personnel's salary, and other benefits in order to force such personnel to continue working for the organization. Supplier shall not use labor-only contracting arrangements, consecutive short-term, contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labor and social security.

Performance Management

Supplier shall have a system to manage employee performance and ensure it is evaluated fairly and objectively, against defined criteria and on a periodic basis, to identify ways to improve performance.

Competence and Development

Supplier shall ensure that employees have the education, training and competences required for their position and tasks and that they are aware of the policies, rights and responsibilities related to carrying out their duties. Supplier shall develop training plans based on competence analyses and implement them to enhance and develop workforce capabilities.

Feedback and Complaint Channels

Supplier shall have a system through which employees can give feedback or complain about unethical conduct, unfair treatment or practices, violation of company values, policies and procedures, or improvement ideas and suggestions.

Management shall act upon this feedback and handle it confidentially and anonymously.

Non-retaliation as defined in section E6 of the RBA code of conduct V6.0 shall apply to all the sections covered in the code.

Exit Procedure

Supplier shall ensure that exit procedures comply with applicable collective agreements. Notice period shall be the same for the employee and employer. There shall be proper documentation for exiting employees such as resignation, termination and proper final settlement calculation and proof of final payment for all employees leaving the company (including those who are absconding from the job). Supplier shall process any personal data submitted by the employee fairly, lawfully and carefully in a way that protects the privacy and rights of employees. Records of employees who have left the company and their clearance process shall be maintained for a minimum 12 months, unless otherwise required by applicable privacy law.

Non-disclosure and Confidentiality Agreements

Supplier shall ensure that employees working with Nokia products or projects or having access to Nokia specific knowledge, information or data, or to Nokia facilities, have signed a Non-Disclosure Agreement (NDA) separately or as part of the working contract. Supplier shall ensure that the employees fully understand its practical implications.

Human Rights and use of Telecommunications Technology

Suppliers shall be aware and align to the positions outlined in the [Nokia' Human Rights Policy](#) regarding the misuse of communications technology to infringe on human rights. Nokia expects that the technology it provides legally and in good faith will be used properly and lawfully, consistent with the human rights obligations of our customers and their governments. It is not the intent of Nokia to violate or provide products or services that violate human rights. This obligation extends to any supplier who is operating, configuring, maintaining or offering any service related to Nokia or on its behalf. Supplier shall report any violation of these policies via the existing grievance channels.

4. Occupational Health and Safety Protection

In addition to section B of RBA Code, the supplier shall appoint a senior management representative responsible for ensuring a safe and healthy workplace environment for all personnel. Supplier shall nominate and train persons responsible for the occupational health of employees.

Supplier shall assume responsibility for the occupational health of employees working off-site (e.g., at customer premises). This responsibility extends to any part-time and temporary workers employed or subcontracted by the supplier.

Nokia Life Saving Rules

Supplier shall observe the following rules and ensure compliance and awareness at all levels and monitor compliance with Nokia Life Saving Rules:

- Always wear a seat belt in ANY vehicle.
- Do not drive distracted or tired - take a break every 2 hours.
- Always drive at a safe speed for road, traffic and weather conditions. Do not exceed the speed limit.

- Always attach yourself and your equipment when working at height.
- Always make sure that nobody enters the space below when you are working at height.
- Do not work on live electrical system. Do not work on any electrical system unless you are trained.

Supplier shall educate its employees about refusal to work right if any of the Life Saving Rules are not met. All supplier's personnel have the right to refuse to conduct a task that they believe is dangerous and places them at immediate risk of injury without seeking permission from the organization.

5. Environment Management

Environmental Management System

Supplier shall have an environmental management system (EMS) ensuring effective planning, operation and control of environmental aspects. The EMS shall satisfy the requirements of ISO14001 or other internationally recognized standards. Suppliers that provide materials that are embedded into Nokia products need to be certified to by third party as compliant with ISO14001.

Raw Material Content Data Management

Supplier shall comply with material restrictions, set by applicable law and Nokia, and continuously maintain records of full raw material content data (materials, substances and compounds) of products supplied to Nokia or of materials used in implementing the services provided to Nokia. These records (including any updates) shall be provided to Nokia in a format specified by Nokia.

Design for Environment Requirements

Supplier shall consider environmental aspects in all phases of product development, using, for example, specific Design-for-Environment (DfE) methods or checklists. Supplier shall comply with Nokia product environmental requirements e.g., Nokia Substance List. Choices made during these product development phases shall, whenever possible, reduce or eliminate negative environmental impacts. All reasonable attempts shall be made to reduce or eliminate hazardous constituents from the product, to promote efficient use of materials (i.e., to reduce waste), to improve energy efficiency of the product and to promote recycling.

Recycled Contents

Supplier shall track its recycled/scrap origin materials contents and strive to reduce its use of virgin materials.

Waste Management

In addition to RBA requirement D4 Supplier shall record information about waste management (i.e. how much and where waste is reused, recycled, energy recovered, sent to landfill etc.) and provide this information to Nokia on request.

6. Supplier Management and Sustainability Requirements

As a part of Supplier requirements to the Nokia's sub-suppliers, a supplier shall also set

environmental and labor condition requirements (e.g., occupational health and safety, ethical conduct, responsible minerals) for its suppliers. They need to evaluate sub-supplier's performance and set improvement targets. The requirements shall be aligned with RBA Code and Nokia supplier requirements. If a sub-supplier is used for waste disposal, the Nokia supplier shall ensure the sub-supplier is appropriately authorized and licensed.

Responsible Minerals Due Diligence

Suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, gold and/or cobalt shall implement and communicate to sub-suppliers their Responsible Minerals Policy. Suppliers shall work with sub-suppliers to ensure traceability of these metals at least to smelter level. Traceability data shall be maintained and recorded for 5 years and provided to Nokia upon request. Suppliers shall ensure that purchased metals originate from smelters validated by industry audit mechanism (such as Responsible Minerals Initiative) as Conformant to respective audit protocols.

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